

EXHIBIT D

**CUMULATIVE SUMMARY OF INTERIM APPLICATIONS OF
CAPLIN & DRYSDALE, CHARTERED, FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS HOLDINGS
ASBESTOS-RELATED CLAIMS
MOTORS LIQUIDATION COMPANY
FOR THE PERIOD OCTOBER 1, 2010 THROUGH MARCH 31, 2011
POST "EFFECTIVE DATE" TIME FROM APRIL 1-MAY 13, 2011 (INCLUDED)**

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

Project Category (Examples)	Total Hours For The Period 10/1/10 3/31/11	Total Hours From The Petition Date	Total Fees For The Period 10/1/10 – 3/31/11	Total Fees From The Petition Date
Asset Analysis and Recovery	8.6	108.3	3,787.00	60,394.50
Asset Disposition	.0	.0	.00	.00
Business Operations	.0	4.1	.00	2,767.50
Case Administration	28.3	248.5	14,821.00	110,082.50
Claims Administration & Objections	.0	.4	.00	270.00
Employee Benefits/Pensions	.0	.0	.00	.00
Fee Applications-Self	119.5	248.1	24,389.50	53,633.60
Objections/Fee/Retention Applications	.0	195.4	.00	72,554.50
Financing	.0	.0	.00	.00
Litigation	1,102.60	1,616.9	465,978.50	692,841.50
Plan and Disclosure Statement	911.9	1,515.5	451,104.50	769,204.00
Relief from Stay Proceedings	.0	.6	.00	405.00
Tax Issues	18.2	18.2	13,528.50	13,528.50
Valuation	.0	8.0	.00	4,520.00
Committee Meetings/ Conferences	65.0	232.8	39,457.00	139,180.50
Travel	48.3	71.6	14,243.00	21,912.75
Docket Review & Control	174.8	247.4	35,409.00	49,960.50
Fee Applications – Others	31.1	50.9	4,471.50	10,724.00
Retention Applications – Others	11.2	75.7	3,854.50	28,450.00
Retention Applications – Self	.0	219.6	.00	87,846.50
Fee Auditor Matters - Self	70.9	142.1	35,030.00	72,665.50
Estimation Hearing	263.8	263.8	112,712.00	112,712.00
TOTAL	2,854.2	5,267.9	1,218,786.00	2,303,653.35
Post "Effective Date" Time April 1 – May 13, 2011	45.6	45.6	11,261.75	11,261.75
Total after adjustment	2,899.8	5,313.5	1,230,047.75	\$2,314,915.10

CUMULATIVE EXPENSE SUMMARY

Expense Category (Examples)	Total Expenses For The Period 10/1/10 – 3/31/11	Total Expense From The Petition Date
Computer Assisted Research	\$ 60,896.43	\$ 99,033.23
Research Materials	\$ 1,122.72	\$ 1,472.86
Air Freight & Express Mail	\$ 1,613.77	\$ 2,761.94
Outside Local Deliveries	\$ 21.60	\$ 134.85
Filing Fees	\$ 110.00	\$ 310.00
Professional Fees + Expert Witness Fees	\$.00	\$ 35,306.00
Outside Fax Service	\$.00	\$.00
Court Reporting/Transcript Services	\$ 986.90	\$ 2,269.00
Conference Meals	\$ 35.44	\$ 101.37
Outside Photocopy Service	\$ 6,916.90	\$ 8,065.36
Miscellaneous Client Advances	\$.00	\$.00
Air & Train Transportation	\$ 4,727.05	\$ 6,812.69
Meals Related to Travel	\$ 344.61	\$ 604.80
Travel Expenses – Hotel Charges	\$ 3,528.69	\$ 4,521.77
Travel Expenses – Ground Transportation	\$ 795.27	\$ 1,229.72
Travel Expenses – Miscellaneous	\$.00	\$.00
Travel Expenses – LD Calls on Hotel Bill	\$ 54.81	\$ 98.71
Local Transportation – DC	\$ 298.66	\$ 844.96
Local Transportation – NY	\$ 936.08	\$ 1,247.29
Xeroxing	\$ 1,986.20	\$ 4,238.45
Postage	\$ 9.12	\$ 39.11
Telecopier	\$.00	\$.00
Use of Personal Cell/Home Phone	\$ 2,833.64	\$ 3,982.55
Long Distance – Credit Card	\$.00	\$.00
Long Distance Telephone – DC	\$ 68.29	\$ 159.20
NYO Long Distance Telephone	\$ 1,119.72	\$ 1,364.72
TOTAL	\$ 88,405.90	\$ 174,598.58